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Pursuant to FRCP R. 30, each party is permitted to conduct up to ten (10) depositions as a matter of right. After meeting and conferring and considering the number of depositions Plaintiff has already taken in this matter, and taking into consideration Plaintiff's need to take at least five additional depositions (consisting of two 30(b)(6) witnesses and three additional percipient lay witnesses), Plaintiff Ciara Williams ("Plaintiff"), Defendant TopGolf USA Las Vegas, LLC ("TopGolf LV"), and Defendant TopGolf USA, Inc. ("TGUSA") (collectively "TopGolf Defendants") <sup>1</sup> by and through their respective attorneys, hereby stipulate that Plaintiff is permitted to take up to thirteen depositions in this action without requiring leave of court.

Plaintiff reserves the right to seek leave of court pursuant to FRCP R. 30(a)(2) to take additional depositions, and Defendants reserve the right to assert objections should Plaintiff seek this leave.

IT IS SO ORDERED.

NANCY J. KOPPE

UNITED STATES MAGISTRATE JUDGE

DATED: April 9, 2021

Defendant Silvino Hinojosa is currently incarcerated in Clark County Detention Center. A copy of this stipulation will be served on him via First Class Mail.